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John J. Meehan

August 13, 2020

VIA ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: 8/14/2020
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Re: Gray v. The Standard Hotel, et al.
20 Civ. 2931 (MKV)

Your Honor:

I represent plaintiff Amira Gray in the above-referenced matter. I write now to respectfully request an extension of time, from to August 14, 2020, to August 28, 2020 for plaintiff to file an amended complaint in this action. Additionally, the parties seek an extension of time, from August 13, 2020, to September 11, 2020, to serve their discovery demands. Matthew Berger, Esq, counsel for defendants, joins in this request. This the second request for an extension of time to file plaintiff's amended complaint, and the first request for an extension of the discovery demands deadline.

The reason for this application is that the parties are still in the process of locating the residencies of all owners of defendant Standard International Management, LLC, in order to properly plead diversity jurisdiction. Defense counsel has been working with his client to provide the information to plaintiff, and will provide the information as soon as possible. However, the information will not be available in time for plaintiff to file the amended complaint by tomorrow. The parties are hopeful that the information will be provided by the end of the week of August 17, 2020.

Additionally, as the parties are still working on this LLC information for the filing of an amended complaint, we respectfully request additional time to serve discovery demands. Once the amended complaint is filed, the parties can draft proper discovery demands.

Based on the foregoing, the parties respectfully request an extension of time, from August 14, 2020, to August 28, 2020 for plaintiff to file an amended complaint in this action, and an extension of time, from August 13, 2020, to September 11, 2020, to serve their discovery demands.

I thank the Court for consideration of this request.

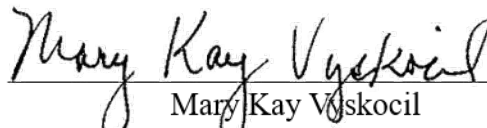
Respectfully submitted,


John J. Meehan

cc: Matthew Berger, Esq.
Counsel for defendants.

GRANTED IN PART AND DENIED IN PART. The Court's Individual Practices require that applications to extend a deadline be made at least 72 hours in advance of the deadline. Thus, this application is untimely. The deadline to file an amended complaint is extended to September 11, 2020. However, as the anticipated amendment is only permitted to address the citizenship of one Defendant, discovery will not be stayed pending the filing of the amended complaint. Initial discovery requests should be exchanged by August 17, 2020. The Court is unlikely to extend the overall time for discovery in this case. The Parties are reminded that to the extent disputes arise in discovery, they must be presented to the Court sufficiently in advance of the existing discovery deadline to allow for review, ruling, and any resulting discovery within the existing deadlines. The Court will not extend discovery deadlines because of disputes brought to the Court's attention too late. SO ORDERED.

Date: 8/14/2020
New York, New York


Mary Kay Vyskocil
United States District Judge